

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CARMON,)	
)	
PLAINTIFF)	Case No. 1:14-cv-00428-GBL-TRJ
vs.)	
)	<u>JURY TRIAL DEMANDED</u>
SITES et al. ,)	
)	
DEFENDANTS)	

PLAINTIFF's PRETRIAL DISCLOSURES

COMES NOW Plaintiff, Jesse Carmon, by and through his undersigned counsel, Rachael A. S. Moshman, and submits the following exhibit and witness lists:

PLAINTIFF'S TRIAL WITNESSES

Will Call

1. Jesse Carmon

May Call

1. Georgia Hovhannisyan

2. PFC Eric Halusa

3. Pedro Santiago

4. Robert Rainey

5. Michael Tang

6. Mark Sites

7. Nurse Harding

8. Sergeant Scott Owens

9. Inmates who witnessed the incident.
10. The inmate who wrote Mr. Carmon a letter about the incident
10. Plaintiff reserves the right to call any witnesses the Defendant names.
11. Plaintiff reserves the right to call any witnesses identified in discovery.

PLAINTIFF'S TRIAL EXHIBITS

May Use

1. Hovhannisyan Incident Report
2. Halusa Incident Report
3. G. Shammass Incident Report
4. Carmon's medical records from INOVA Fair Oaks Hospital
5. Inmate records
6. Fairfax ADC Chronological Record of Medical Care
7. Photographs of Carmon
8. Video footage from the prison related to the incident
8. Plaintiff reserves the right to use any exhibits identified by Defendants.
9. Plaintiff reserves the right to use any exhibits identified in discovery.

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of October, 2014, I served a copy of the foregoing Plaintiff's Pretrial Disclosures upon the following via ECF:

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